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*Attorney for Plaintiff Salih A. Al-Halim*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Salih A. Al-Halim,

Plaintiff,

v.

Boatner Asset Recovery, Inc. dba  
Premier Recovery Service and Drive  
and Go LLC,

Defendants.

Case No.: 2:21-cv-00729-RFB-EJY

**Stipulation for an extension of time  
for Plaintiff to respond to Defendant  
Boatner Asset Recovery, Inc. dba  
Premier Recovery Service's motion  
to dismiss**

**(First request)**

Salih A. Al-Halim ("Plaintiff") and Boatner Asset Recovery, Inc. dba Premier Recovery Service ("Defendant" and together with Plaintiff as the "parties"), by and through their respective counsel, hereby submit this stipulation for an extension of time for Plaintiff to respond to Defendant's motion to dismiss, filed on June 30, 2021. ECF 13. This is the first request for an extension of this deadline.

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In good faith and not for the purposes of delay, the parties therefore stipulate that Plaintiff's opposition to the pending motion shall be due on or before **August 6, 2021**.

Dated: July 28, 2021.

**FREEDOM LAW FIRM**

/s/ Gerardo Avalos  
Gerardo Avalos, Esq.  
8985 S. Eastern Ave., Suite 350  
Las Vegas, Nevada 89123  
*Attorney for Plaintiff Salih A. Al-Halim*

**LEE, LANDRUM & INGLE**

/s/ Michael Kostrinsky  
Michael Kostrinsky, Esq.  
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Las Vegas, Nevada 89128  
*Counsel for Boatner Asset Recovery, Inc. dba Premier Recovery Service*

IT IS SO ORDERED:

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 28th day of July, 2021.